

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES

**v.**

**MATTHEW RYAN MILLER,**

***Defendant.***

[illegible]

**Crim. No. 21-CR-0075(RDM)**

**SECOND SUPPLEMENT TO DEFENDANT’S AMENDED MOTION FOR  
MODIFICATION OF PRETRIAL DETENTION ORDER AND  
MEMORANDUM OF POINTS AND AUTHORITIES**

Defendant Matthew Ryan Miller (“Miller”), by and through undersigned counsel, hereby submits this Second Supplement to his Amended Motion for Modification of Pretrial Detention Order and respectfully moves this Honorable Court to consider the attached letters when ruling upon his Motion.

**Dated:** Washington, DC  
February 15, 2021

**BALAREZO LAW**

/s/

By:

A. Eduardo Balarezo, Esq.  
D.C. Bar # 462659  
400 Seventh Street, NW  
Suite 306  
Washington, DC 20004  
Tel. 202-639-0999  
Fax. 202-639-0899

*Counsel for Defendant Matthew Miller*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of February 2021, I caused a true and correct copy of the foregoing Supplement to Defendant's Amended Motion for Modification of Pre-Trial Detention Order and Memorandum of Points and Authorities in Support Thereof to be delivered to the parties in this matter via Electronic Case Filing (ECF).

/s/

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A. Eduardo Balarezo

From: Michele Miller  
2351 Rt. 97  
Cooksville, MD 21723  
E-mail: frenchtoast2720@gmail.com

Dear Honorable Randolph Moss,

My name is Michele Miller and Mathew Miller is my youngest son. This letter has been very difficult for me to write and I wish I knew where to begin. I am brokenhearted to learn of the criminal charges that my son faces. These serious offenses are so out of character for him.

Let me start by saying that I am extremely close to my son and would like to share with you the goodness that I see in him. From birth to a very young age, Mathew attended the Catholic Church and served as an Acolyte. As a young teen, he began attending the Lutheran Church where he was actively involved in youth Outreach Programs. At the age of 5, Mathew began to participate in local sports, including football and baseball; he continued to play baseball through the age of eighteen. Mathew's work history began at the age of 15 working at a Country Club where he bussed tables. From there, he took employment at a local Hardware Store. After a year-and -a -half of college, Mathew made the decision to accept a full time job offer with Clenelg Construction Co. where he excelled quickly in many different roles.

Mathew's father and I divorced when he was 7 years old. My two sons and I moved into my mother's home for financial reasons, as well as a desire to keep them in their same school district. We remain there today and provide elder care for my 81 year old mother. Due to my circumstances of being a single mother, I relied on Mathew more and more as he grew up, which included household duties as well as financial help at times; especially while his older brother was away to college. Mathew continues to help me in this manner.

I have been employed with the Howard County Public School System for over twelve years and clean homes as a second income. Because I work lengthy hours on certain days, Mathew makes sure his grandmother has her meals and medicines upon his return from work.

Mathew is a very understanding and caring person. He loves the company of others and is the first to step up and lend a helping hand to those in need. At the young age of twenty-two, it saddens me that my son has been caught-up in a situation which could stain his reputation for life.

Other than a speeding ticket, Mathew has never been in trouble. Please, your honor, I beg you to consider Mathew's age, and I hope you will look at my boy and his accomplishments as I stated above. Please factor all this into consideration when determining the outcome.

Respectfully,

Michele Miller

April Dore  
810 Brassie Lane  
Unit D / PMB #4  
Glen Allen, VA 23059  
(804)366-2912

February 12, 2021

Dear Honorable Randolph Moss:

**Re: Case No. 21-CR-0075; Matthew Ryan Miller**

I am writing to you on behalf of the criminal case against Matthew. I am aware of the criminal charges and shocked at severity of such behavior, which is not in character to the boy I know.

I have been friends with Matthew and his family since his birth in Mechanicsville, VA. When the Millers moved to Maryland, we remained close and visited on holidays and summer breaks. Once high school graduations were complete for our families, visits became more frequent.

Matthew and I have kept in touch. My trips to Maryland were made to accommodate his work and social schedule. He has always been respectful, entertaining and fun. I have been proud of how he takes care of his grandmother and has been responsible for maintenance of their home. Although we have enjoyed football, joking and needling one another, I have known Matthew to be unworldly at times. Boys his age have less maturity and are still developing.

Matthew has preferred a hands-on approach when it came to learning. He loved his job, and he took his work serious. While he attended community college, he also worked part-time. He saved enough to purchase a used car from me in 2018. When a full-time job opportunity presented, he was excited. It was a perfect position for him to utilize his skills and offered growth within the company.

I worked for Hanover Country Public Schools of Virginia, in the Special Education Department. Civics was just one of the classes I taught. I was happy when Matthew seemed to take an active role in exercising his freedoms. Although we live in different states, I have encouraged Matthew to participate in his community by volunteering and staying informed.

Your Honor, my hope is you take into account his impressionable young mind and consider his age and maturity level at the arraignment and bond hearing. I believe Matthew will follow any restrictions set forth by your court.

Respectfully,

April Dore

January 15, 2021

Re: Matthew Ryan Miller

Dear Honorable Randolph Moss,

I have known Matthew Miller as good moral character. I was both troubled and surprised to hear about this recent case as he has always been a rather solid person. It is for this reason I am happy to write a letter of reference for Matthew regarding this matter. I understand the seriousness of this matter however I hope the court will show some leniency.

I have known Matthew Miller for 20 years, as he is one best friend's son, and in the time I have seen many aspects of Matthew's personality. I have always found him to be extremely kind, dependable and well-regarded among his peers.

I can tell you without a doubt that Matthew is incredibly remorseful for what he has done. It was a mistake, but Matthew deserves a second chance. I hope you are willing to give him one.

Sincerely,

Virginia Janoske

Donna R. Vozniak  
P.O. Box 148  
Glenwood, MD 21738  
(Mailing Address)

2351 Rt. 97  
Cooksville, MD 21723  
(Physical Address)

Dear Honorable Randolph Moss,

Mathew Ryan Miller is my grandson. He has lived with me for fifteen years. He has been a good and responsible young man. Very pleasant to know and to be with. Always willing to give a helping hand. He has always been a caring and respectful person. His friends seem to be very nice.

He is a good worker. He shares work experiences with me. He has worked in the electrical field under the supervision of a Master Electrician at Glenelg Construction for the past 2 years.

Mathew is a High School Graduate of twelve years, with what I believe, a year and a half of college. To my knowledge, he has no malicious behavior history.

As his 81 year old grandmother, I was shocked to hear about the January 6 protesting at the Capital Building of our great nation!

I am a Retired Federal Law Enforcement Employee, having served in the Federal Bureau of Investigation (FBI) for 25 years! I have assisted in raising my two grandchildren to be respectable and lawful citizens.

Respectfully,

Donna R. Vozniak

Sonja O Vozniak  
1514 Larel Court  
Mount Airy, MD 21771

February 14, 2021

RE: Matthew Ryan Miller

To: The Honorable Judge Randolph Moss

I am sitting in my hospital room recovering from my ruptured appendix surgery writing to you. I know how important Matt is to me and my family. I am a registered nurse for Johns Hopkins Hospital for over 25 years. I have known Matt since he was 2 years old and at the time I was dating his uncle. Matthew didn't even speak yet when we met at Christmas dinner 2000.

But once he started talking he never stopped. He was a people's person and enjoyed being around others. He enjoyed the little things too. Blowing out the candles on his birthday cake. Hearing Santa and his reindeer drop off gifts to the front door. But most of all he enjoyed spending time with his family.

So it was very hard for Matt when his parents separated and divorced over 15 years ago. I think he thought he had to pick a side. And even today his parents don't communicate. I think the way he coped with that, unfortunately, was by drinking. He thought he was being the man of the family for his mother and grandmother. And they definitely depended and still do depend on him. He always has there best interests at heart. His elderly and chronically ill grandmother depends on him and she feels safer when he's home with her. I may not know what Matt's involved in now, but I do know that he's the guy that would get out of a car and helped a little old lady cross the street. He's the guy who would break up a fight between young kids. And definitely, he would not knowingly cause harm to members of his community.

This could be the turning point he needs in his life to address his drinking issues. Every event is not a tailgate party. This is an opportunity for him to see that alcohol maybe directly associated with the poor decisions he made on January 6, 2021. I know how sad he is that he disappointed so many people in his life that depend on him. I can't wait for him to show us, the courts, and the rest of society who he truly is.

It is my sincere hope the court takes this letter into consideration when deciding his case. Despite this case, Matthew is a hard-worker, dependable, gentle, and a loving member of the community and our family.

Sincerely,

Sonja O Vozniak